

### REMARKS

This application has been reviewed in light of the Office Action dated September 15, 2006. Claims 1-19 are presented for examination. Claims 20-38 have been canceled, without prejudice or disclaimer of subject matter recited therein. Claims 1, 2, and 4-19 have been amended to define more clearly what Applicants regard as their invention. Claims 1 and 19 are in independent form. Favorable reconsideration is requested.

Claim 19 was rejected under 35 U.S.C. § 112, second paragraph. In response, Claim 19 has been carefully reviewed and amended as deemed necessary to ensure that it conforms fully to the requirements of Section 112, second paragraph, with special attention to the points raised in paragraphs 3 and 4 of the Office Action. Specifically, Claim 19 has been amended to change “handler” to “at least two handlers”. As a result, it is believed that the rejection under Section 112, second paragraph, has been obviated, and its withdrawal is therefore respectfully requested.

Claims 1-16, 18, and 19 were rejected under 35 U.S.C. § 103(a) as being obvious from McDonough (U.S. Patent No. 6,070,142). In addition, Claim 17 was rejected under 35 U.S.C. § 103(a) as being obvious from McDonough (U.S. Patent No. 6,070,142) in view of Cunningham (U.S. Patent No. 6,014,645).

In response, while not conceding the propriety of the rejections, independent Claims 1 and 19 have been amended. Applicants submit that as amended, these claims are allowable for the following reasons.

Independent Claim 1 relates to an E-Acquisition System comprising a client interface system configured to accept event request data from at least one client, and a computerized account processing system.

Claim 1 has been amended to recite that the computerized account processing system comprises a plurality of product or service-specific handler systems.

Claim 1 has also been amended to recite that the computerized account processing system communicates with the client interface system and is configured to facilitate product or service fulfillment for the client, to select one of the plurality of product or service-specific handler systems to process the event request from the client, and to transmit the event request data to the selected product or service-specific handler system.

Claim 1 has been further amended to recite that the plurality of product or service-specific handler systems are configured to perform product or service-specific business logic related to the event request from the client in response to receiving the transmitted event request data.

Claim 1 has been further amended to recite that the computerized account processing system further comprises at least one worker utility invoked by the selected handler system to perform tasks associated with the event request to perform the product or service fulfillment for the client.

By using a plurality of product or service-specific handler systems, the system can easily be upgraded to add new functionality by merely adding another product or service-specific handler system. In addition, the complexity of the handler system can precisely match the requests the system is designed to fulfill at any one time, since the system may employ only handler systems for the specific products or services demanded by existing clients.

In contrast, the patent to McDonough is not understood to disclose or suggest a plurality of product or service-specific handler systems, as recited by amended Claim 1. In

addition, this patent is also not understood to disclose or suggest that a computerized account processing system is configured to select one of the plurality of product or service-specific handler systems to process an event request from the client, and to transmit the event request data to the selected product or service-specific handler system, as also recited by amended Claim 1. Further, this patent is not understood to disclose or suggest that the plurality of product or service-specific handler systems are configured to perform product or service-specific business logic related to the event request from the client in response to receiving the transmitted event request data.

Rather, the patent to McDonough is understood to disclose Voice Response Units (VRUs) 320, which receive a customer request and initiate navigation to a resource that can fulfill the customer's request. If it is determined that a call should be directed to a particular resource for fulfillment of the request, the VRUs are understood to interact with a routing engine 360 through a Computer Telephone Interface (CTI) 370 to initiate transfer of the call to the appropriate resource. (Column 7, lines 25-40). Thus, this patent teaches the use of a single set of elements (320, 370, and 360) that are always used to route every call to the appropriate resource for fulfillment, rather than using a system to select one of a plurality of handler systems that invoke a worker utility to perform product or service fulfillment for a client, as recited by amended Claim 1. In addition, elements 320, 360, and 370 are not understood to be disclosed to be a product or service-specific handler system configured to perform product or service-specific business logic, as also recited by amended Claim 1. Rather, these elements appears to route calls to any product or service provider with which it has a relationship.

The Office Action cites element 370 as corresponding to the claimed handler system. But, as noted above, this element fails to fulfill at least two conditions of the handler systems recited in amended Claim 1.

Since the patent to McDonough is not understood to disclose or suggest at least two features of amended Claim 1, Applicants submit that the Office has not established a prima facie case of obviousness against amended Claim 1, since MPEP Section 2142 requires the cited art to disclose or suggest all the claimed features to establish a prima facie case of obviousness. For this reason, Applicants respectfully request that the rejection of amended Claim 1 be withdrawn. And since independent Claim 19 recites features similar to those discussed above with respect to Claim 1, it is also believed to be patentable over the patent to McDonough for the reasons discussed above.

A review of the other art of record has failed to reveal anything which, in Applicants' opinion, would remedy the deficiencies of the art discussed above, as references against the independent claims herein. Those claims are therefore believed patentable over the art of record.

The other claims in this application are each dependent from one or another of the independent claims discussed above and are therefore believed patentable for the same reasons. Since each dependent claim is also deemed to define an additional aspect of the invention, however, the individual consideration or reconsideration, as the case may be, of the patentability of each on its own merits is respectfully requested.

In view of the above amendments and remarks, Applicants respectfully request favorable consideration and early passage to issue of the present application.

Applicants undersigned attorney may be reached in our Washington, D.C. office by telephone at (202) 530-1010. All correspondence should continue to be directed to our below listed address.

Respectfully submitted,

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